## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

IN RE: DAIMLERCHRYSLER AG SECURITIES LITIGATION

Master File No. 00-993 (JJF)

## LEAD PLAINTIFFS' MOTION TO CONDUCT A DISTRIBUTION OF THE NET SETTLEMENT FUND, AND FOR PAYMENT OF CERTAIN FEES AND DISBURSEMENTS

Pursuant to Federal Rule of Civil Procedure 23(e), Lead Plaintiffs, Florida State Board of Administration, Policemen's Annuity and Benefit Fund of Chicago, Municipal Employees Annuity and Benefit Fund of Chicago, and Denver Employees Retirement Plan (collectively, the "Lead Plaintiffs"), by their undersigned attorneys, hereby move this Court to enter the accompanying order authorizing a distribution of the Net Settlement for the above-referenced Action, and approving Lead Counsel's application for reimbursement of certain fees and expenses incurred by the Garden City Group, Inc. ("GCG"). This motion is based on the accompanying Affidavit of Jack R. DiGiovanni, a Director of Securities and Operations of GCG, dated September 20, 2005. If approved, the order will, *inter alia*:

- 1) Direct distribution of all of the Net Settlement Fund to Claimants whose Proof of Claim have been accepted;
- Authorize payment to The Garden City Group, Inc. of \$431,633.17 from the Settlement Fund for fees and expenses incurred from November 1, 2004 through August 16, 2005 relating to the administration of the Settlement;

3) Grant such other and further relief as this Court deems appropriate

Dated: September 30, 2005

Respectfully submitted,

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